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#### **REDACTED - FOR PUBLIC INSPECTION**

July 1, 2016

#### **VIA ECFS**

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

## RE: REQUEST FOR CONFIDENTIAL TREATMENT WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information – Subject to Protective Order Before the Federal Communications Commission

#### Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Delcambre Telephone Company, LLC ("Delcambre" or "the Company"), Study Area Code 270428 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Company's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.* 

The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential



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treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Delcambre maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

#### Five-Year Service Quality Improvement Plan Progress Report

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Delcambre requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company maintains as confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Company's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to

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improve service quality, service coverage, and/or service capacity. It also contains a map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Company's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

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(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

#### **Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Delcambre seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Delcambre is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

<sup>&</sup>lt;sup>1</sup> Connect America Fund, ETC Annual Reports and Certifications, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 (rel. Mar. 22, 2016).

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Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Stuart Polikoff

Authorized Representative for

Delcambre Telephone Company, LLC

want Polikoff

SEP/pjf

cc:

**Enclosures** 

Ms. Marcy Landry, Delcambre Telephone Company, LLC

FCC Foi	rm 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	270428	
<015>	Study Area Name	DELCAMBRE TEL CO	
<020>	Program Year	2017	
<030>	Contact Name: Person USAC should contact with questions about this data	Marcy Landry	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3376852311 ext.	
<039>	Contact Email Address: Email of the person identified in data line <030>	mlandry@delcambre.net	
	Form Type	54.313 and 54.422	

	ervice Quality Improvement Reporting ollection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> <015> <020> <030> <035> <039>	Study Area Code Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030>	270428  DELCAMBRE TEL CO  2017  Marcy Landry 3376852311 ext.  mlandry@delcambre.net	
<110>	Has your company received its ETC certification from the FCC?  If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no ) (yes / no )	
<112>	If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your CETC which only receives frozen support, your progress report is only required to address voice telephony service.	2704281a112.	pdf
	Please select the appropriate responses below (Yes, No, Not Applicable) to conthat the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to §54.202(a). The information shall submitted at the wire center level or census block as appropriate.	ve-year	Name of Attached Document
<113> <114> <115> <116> <117> <118>	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How much (USF) was used to improve service quality and how support was used to improve much (USF) was used to improve service coverage and how support was used to improve much (USF) was used to improve service capacity and how support was used to improve an explanation of network improvement targets not met in the prior calendar year.	nprove service coverage Yes	ble

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

ata Colle	ection Form									2013	-0986/OMB Control N	0. 3060-0819
<010>	Study Area Co	nde				270428						
<015>	Study Area Na					DELCAMBRE TI	ET 00					
<020>						2017	EL CO					
	Program Year		S -   -   -   -   -   -   -   -   -   -									
<030>				t regarding this		Marcy Landr 3376852311						
<035>				rson identified		302						
<039>	Contact Email	Address - Ema	il Address of pe	erson identified	in data line <0	30> mlandry@del	cambre.net					
<210>	For the prior	r calendar yea	ar, were there	any reportal	ole voice servi	ice outages?	No					
<220>	<a></a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS									Did This Outage	, and the second	
	Reference	Outage Start	Outage Start	Outage End	_	Number of		911 Facilities	Service Outage	Affect Multiple		
	Number	Date	Time	Date	Time	Customers Affected	Total Number of	Affected	Description (Check	Study Areas	Service Outage	Preventative
							Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures
				_	_					<u> </u>		

(300) Unfulfilled Service Request Data Collection Form				FCC Form 481 OMB Control No. 3060-0986/OMB Contro July 2013	ol No. 3060-0819
<010> Study Area Code		270428			
<015> Study Area Name		DELCAMBRE TEL CO			
<020> Program Year		2017			
<030> Contact Name - Person USAC	hould contact regarding this data	Marcy Landry			
<035> Contact Telephone Number - I	lumber of person identified in data line <030	)> 3376852311 ext.			
<039> Contact Email Address - Email	Address of person identified in data line <030	)> mlandry@delcambre.net			
<300> Unfulfilled service request (voice)		0	·		
<310> Detail on attempts (voice)					
		Name of Attached Document			
<320> Unfulfilled service request (broad	band)	0			
<330> Detail on attempts (broadband)					_
		Name of Attached Document			

(400) Number of Complaints per 1,000 customers	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code 270428
<015>	Study Area Name DELCAMBRE TEL CO
<020>	Program Year 2017
<030>	Contact Name - Person USAC should contact regarding this data  Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <a href="https://doi.org/10.1007/journal.org/"> <a href="https://doi.org/10.1007/journal.org/"> <a href="https://doi.org/10.1007/journal.org/"> <a href="https://doi.org/10.1007/journal.org/"> <a href="https://doi.org/"> </a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a>

•	npliance With Service Quality Standards and Consumer Protection Rules ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	270428	
<015>	Study Area Name	DELCAMBRE TEL CO	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry	
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net	
<500>	Certify compliance with applicable service quality standards and consumer pro-	otection rules Yes	
<510>	Descriptive document for Service Quality Standards & Consumer Protection Ru	2704281a510.pdf ules Compliance	

(600) Functionality in Emergency Situations	FCC Form 481		
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819		
	July 2013		

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	270428la610.pdf

(700) Price Offerings including Voice Rate Data Data Collection Form		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010> Study Area Code	270428	
<015> Study Area Name	DELCAMBRE TEL CO	
<020> Program Year	2017	
<030> Contact Name - Person USAC should contact regard	ling this data Marcy Landry	
<035> Contact Telephone Number - Number of person ide	entified in data line <030> 3376852311 ext.	
<039> Contact Email Address - Email Address of person id	entified in data line <030> mlandry@delcambre.net	
<701> Residential Local Service Charge Effective Date <702> Single State-wide Residential Local Service Charge	1/1/2016 13.03	

<703>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
					Residential Local			Mandatory Extended Area	
-	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
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(710) Broadbrand Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
	July 2013

<010>	Study Area Code	70428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select }
				- See attac worksheet -	hed				
				worksneet -					
				_	_				-

(800) Operating Companies		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010> Study Area Code	270428	

<010>	Study Area Code		270428
<015>	Study Area Name		DELCAMBRE TEL CO
<020>	Program Year		2017
<030>	Contact Name - Person U	JSAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Numb	ber - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - E	Email Address of person identified in data line <030>	mlandry@delcambre.net
<810>	Reporting Carrier	Delcambre Telephone Company, LLC	
<811>	Holding Company	Not Applicable	
<812>	Operating Company	Delcambre Telephone Company, LLC	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
_	Affiliates	SAC	Doing Business As Company or Brand Designation
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(900) Tribal Lands Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3 July 2013	3060-0819
<010> <015> <020> <030> <035> <039> <900>	Study Area Code  Study Area Name  Program Year  Contact Name - Person USAC should contact regarding this data  Contact Telephone Number - Number of person identified in data line <030>  Contact Email Address - Email Address of person identified in data line <030>  Does the filing entity offer tribal land services? (Y/N)  Tribal Land(s) on which ETC Serves	DELCAMBRE TEL CO  2017  Marcy Landry 3376852311 ext.  mlandry@delcambre.net  No	
<920>	Tribal Government Engagement Obligation	Name of Attached Document	
to confi	company serves Tribal lands, please select (Yes,No, NA) for each these boxes rm the status described on the attached document(s), on line 920, strates coordination with the Tribal government pursuant to 3(a)(9) includes:	Select Yes or No or Not Applicable	
<921> <922> <923> <924> <925> <926> <927> <928> <927> <928>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions. Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes Compliance with Land Use permitting requirements Compliance with Facilities Siting rules Compliance with Environmental Review processes Compliance with Cultural Preservation review processes Compliance with Tribal Business and Licensing requirements.		

	oice and Broadband Service Rate Comparability lection Form		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010>	Study Area Code		270428
<015>	Study Area Name		DELCAMBRE TEL CO
<020>	Program Year		2017
<030>	Contact Name - Person USAC should contact regarding this data		Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line	e <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line	e <030>	mlandry@delcambre.net
<1000>	Voice services rate comparability certification	Yes	s
<1010>	Attach detailed description for voice services rate comparability compliance	2704	428la1010.pdf
			Name of Attached Document
<1020>	Broadband comparability certification		s - Pricing is no more than the most recent applicable benchmark announced by e Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	27042	281a1030.pdf
			Name of Attached Document

(1100) N	(1100) No Terrestrial Backhaul Reporting				
Data Collection Form				FCC Form 481 OMB Control No. July 2013	3060-0986/OMB Control No. 3060-0819
<010>	Study Area Code	270428			
<015>	Study Area Name	DELCAMBRE	TEL CO		
<020>	Program Year	2017			
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Land	ry		
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311	ext.		
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@de	lcambre.net		
<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Ye	5		
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	s kbps			

(1200) Te	rms and Condition for Lifeline Customers		FCC Form 481
Lifeline			OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Coll</b>	ection Form		July 2013
<010>	Study Area Code	270428	
<015>	Study Area Name	DELCAMBRE TEL CO	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry	
<035>	Contact Telephone Number - Number of person identified in data line <03	0> 3376852311 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <0.	30> mlandry@delcambre.net	
		270428la1210.pdf	
		2701201d1210.pdf	
.4240:	Tarrior O. Caraditiana af Maita Talanda a diffetiva Diagra		
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		
			Name of Attached Document
<1220>	Link to Public Website		
<1220>	Link to Public Website HTTP		
"Dlassa cl	heck these boxes below to confirm that the attached document(s), on line 1210,		
	bsite listed, on line 1220, contains the required information pursuant to		
	(a)(2) annual reporting for ETCs receiving low-income support, carriers must		
annually r			
ailliually i	eport.		
<1221>	Information describing the terms and conditions of any voice	1	
	telephony service plans offered to Lifeline subscribers,	4	
<1222>	Details on the number of minutes provided as part of the plan,	٦	
11111	Details on the number of fillinges provided as part of the plan,	=	
	=	=	
<1223>	Additional charges for toll calls, and rates for each such plan.	<u>J</u>	

Data Collection Form Including Rate of Return Carriers of filiated with Price Cap Local Exchange Carriers  4010- Study Area Code  4010- Study Area Code  4010- Study Area Code  4010- Study Area Code  4010- Program Vear  4010- Study Area Name  4010- Definition Name - Person USAC should contact regarding this data  4010- Study Area Name - Person USAC should contact regarding this data  4010- Contact Name - Person USAC should contact regarding this data  4010- Contact Telephone Number - Suraber of person identified in data line 40300-  4010- Contact Telephone Number - Suraber of person identified in data line 40300-  4010- Contact Telephone Number - Suraber of person identified in data line 40300-  4010- Contact Telephone Number - Suraber of person identified in data line 40300-  4010- Contact Telephone Number - Suraber of person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact Telephone Number - Suraber of Person identified in data line 40300-  4010- Contact	
Collos   Study Area Code   270428   Collos   Study Area Name   CIRCLOMBRIK TRL. CO   Collos   Study Area Name   CIRCLOMBRIK TRL. CO   Collos   Co	319
Study Area Name   DRICKAMENE TRIL TO	
Study Area Name   DERICAMBER THIL CO	
## Service Frogram Vear  ## Service Landry  ## Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reduct and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.  ## Incremental Connect America Phase I reporting  ## 2010	
Contact Telephone Number - Number of person identified in data line <030>	
Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reduct and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The Information reported on this form and in the documents attached below is accurate.  Incremental Connect America Phase I reporting  2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support  2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support  2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(ii). Round 2 recipients only.  2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.	
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54.313(b)(2)(ii). Round 2 recipients only.	
54.313(b)(2)(ii). Round 2 recipients only.	
2024A2 Round 2 Recipient of incremental support:	
200 AD. Attack list of carrous blocks indicating whose funding was apart in vary	
<2024B> Attach list of census blocks indicating where funding was spent in year Name of Attached Document Listing	
two - 54.313(b)(2)(ii). Round 2 recipients only. Required Information	
<2025A> Round 1 or Round 2 Recipient of Incremental Support?	
<2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for Name of Attached Document Listing	
year three and Round 2 for year two) - Connect America Fund , WC Required Information	
Docket 10-90, Report and Order, FCC 13-	
<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	

Data Collection For	rrier Additional Documentation (Continued) m eturn Carriers affiliated with Price Cap Local Exchange Carriers	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013		
<2016>	Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification support used to build broadband			
	: America Phase II Reporting {47 CFR § 54.313(e)}			
<2017A>	Connect America Fund Phase II recipient?			
<2017B>	Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price	Name of Attached Document Listing Required Information		
<2018>	cap carrier used for capital expenditures in 2015. Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)	Name of Attached Document Listing Required Information		
<2019>	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)			
<2020>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)			
<2021>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)			
<2026>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)			
<2027>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)			

(3005) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)				
		У	es - Att	ach Certificat	tion
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}			ĺ	270428la3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Docu Information	ıment Lis	ting Required	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community	Anchors		
(3012B)	Please Provide Attachment	Name of Attached Docu Information	ument Lis	ting Required	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<b>O</b>	0	
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	O	•	
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)				
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		L		
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Docu Information	ıment Lis	ting Required	
(3018)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	(Yes/No)	0	•	
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers				
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows				
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:				
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers			~	
(3023)	Underlying information subjected to a review by an independent certified public accountant			V	
(3024)	Underlying information subjected to an officer certification.			V	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows			V	[0704201 x 2026 m 2f
(3026)	Attach the worksheet listing required information	Name of Attached Docu Information	ıment Lis	ting Required	2704281a3026.pdf

#### **REDACTED - FOR PUBLIC INSPECTION**

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

(4005) Rural Broadband Experiment Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data li	ne <030> mlandry@delcambre.net

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

#### Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001**. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

#### Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a**. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

#### If yes to 4003A, please provide a response for 4003B.

speed and data usage allowances available in the

relevant geographic area.

in yes to 4003A, please provide a response for 4003B.		
<b>4003b</b> . Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
Broadband Deployment Locations – FCC 14-98 (par	agraph 80)	
<b>4004a</b> . Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
<b>4004b</b> . Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband	Name of Attached Document Listing Required Information	

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

# Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Study Area Code of Reporting Carrier: Filling Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment

under Title 18 of the United States Code, 18 U.S.C. § 1001.

	tion - Agent / Carrier ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) <u>Moss Adams LLP</u> also certify that I am an officer of the reporting carrier; my respons agent; and, to the best of my knowledge, the reports and data prov	is authorized to submit the information reported on behalf of the reporting carrier. I ibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized ided to the authorized agent is accurate.
Name of Authorized Agent: Moss Adams LLP	
Name of Reporting Carrier: DELCAMBRE TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 07/01/2016
Printed name of Authorized Officer: Sybil Benoit	
Title or position of Authorized Officer: Billing Manager	
Telephone number of Authorized Officer: 3376852311 ext.	
Study Area Code of Reporting Carrier: 270428	Filing Due Date for this form: 07/01/2016

#### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier							
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients							
the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reporte	d herein is accurat	e.					
Name of Reporting Carrier: DELCAMBRE TEL CO							
Name of Authorized Agent Firm: Moss Adams LLP							
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	07/01/2016					
Name of Authorized Agent Employee: Stuart Polikoff							
Title or position of Authorized Agent or Employee of Agent Consulting Senior Manager							
Telephone number of Authorized Agent or Employee of Agent: 5126527730 ext.							
Study Area Code of Reporting Carrier: 270428 Filing Due Date for this form: 07/01/2016							
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S. 18 of the United States Code, 18 U.S.C. § 1001.	.C. §§ 502, 503(b), or	fine or imprisonment under Title					



(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

<701> Residential Local Service Charge Effective Date 1/1/2016 <702> Single State-wide Residential Local Service Charge 13.03

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
				Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
LA	ALL		FR	13.03	1.0	0.0	0.0	14.03

(710) Broadband Price Off	ering
Data Collection Form	

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

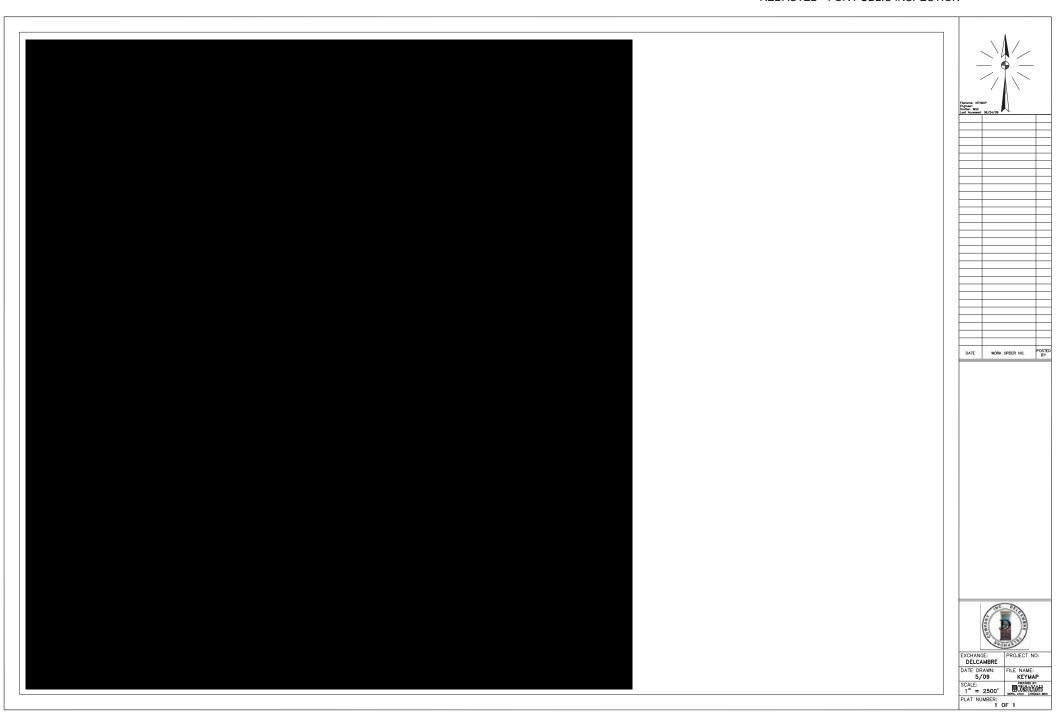
<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mlandry@delcambre.net

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	<d2> <d3></d3></d2>		<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees		Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	LA	ALL	52.95	0.0	52.95	10.0	1.0	999999	Other, No limit on usage allowance
	LA	ALL	72.95	0.0	72.95	30.0	3.0	999999	Other, No limit on usage allowance

# LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN PROGRESS REPORT

Delcambre Telephone Company, LLC ("the Company") received \$158,988 in Universal Service Fund ("USF") support in calendar year 2015.





### LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Delcambre Telephone Company, LLC ("the Company") complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Company operates are outlined in its local exchange tariff, which is approved the Louisiana Public Service Commission ("Louisiana PSC"). The tariff contains provisions regarding the Company's customer service and protection practices.

Service quality standards for voice service are established by the Louisiana PSC. The Company consistently meets or exceeds those standards and provides reports to the Louisiana PSC, in accordance with the Louisiana PSC's rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a "best effort" service and are dependent upon a number of variables, many of which are outside the control of the Company. The Company also complies with the FCC's Open Internet rules, 47 C.F.R. §§8.3-8.11. These rules prohibit blocking, throttling, and paid prioritization, and also require transparency of network management practices, performance, and the commercial terms of broadband services.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the following consumer best practices: (1) the Company discloses its rates and terms of service to customers; (2) the Company provides specific disclosures in its advertising; (3) the Company separately identifies carrier charges from taxes on its billing statements; (4) the Company provides ready access to customer service; (5) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company's compliance with CPNI rules and a description of the Company's operating procedures that ensure compliance are filed annually with the FCC.

#### LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Delcambre Telephone Company, LLC ("the Company") is capable of operating in emergency situations. Standby power generators are supplied at the central office, repeater sites, and video headend to ensure functionality without external power until such power is restored.

The Company is capable of repairing or replacing damaged facilities which it owns. These facilities include copper and fiber cable, utility poles, as well as network routers needed for the recovery of services. The Company is dependent upon AT&T for the rerouting of traffic around damaged facilities, as AT&T owns the facilities in the Company's central office that carry toll and Internet traffic. Although recovery may not be immediate after an emergency, there is a restoration plan in place for an expeditious recovery of services when the emergency has passed and it is safe for the needed repairs to be completed.

#### LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's 2015 reasonable comparability benchmark for voice services was \$47.48, which includes the federal subscriber line charge ("SLC").

In 2015, the single-line residential local rate for all residential customers served by Delcambre Telephone Company, LLC ("the Company") was \$13.03. When the federal SLC (\$6.50) and the state SLC (\$1.00) are included, the rate was \$20.53. Therefore, the Company's pricing of fixed voice services in 2015 was less than the reasonable comparability benchmark of \$47.48.

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<sup>&</sup>lt;sup>1</sup> Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

#### LINE 1030 - BROADBAND SERVICES RATE COMPARABILITY

In 2015, Delcambre Telephone Company, LLC charged a residential rate of \$52.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau. <sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

#### LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

Residential customers of Delcambre Telephone Company, LLC ("the Company") who qualify for the Lifeline Program receive a discount of \$9.25 on local voice telephony service.

For all of the Company's Lifeline customers, the Lifeline single-line residential rate, including the federal subscriber line charge ("SLC") and the state SLC, is \$11.28 (\$20.53 standard rate - \$9.25 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within the local calling area.

Lifeline customers may purchase Local Optional Service ("LOS") for a non-discounted rate of \$.97 plus \$.06/minute capped at \$15.00. LOS is a calling plan that encompasses areas within 40 miles of the Company's local exchange area. Once a customer's calls reach \$15, they will not be billed for any other calls within the 40 mile area. If usage is below the capped rate, the customer only pays for the calls made.

Lifeline customers may subscribe to long distance service offered by the Company at a non-discounted rate of \$.13/minute. Lifeline customers may also choose another long distance carrier. Lifeline customers may also elect to subscribe to toll blocking at no charge.

The Company offers bundled services to Lifeline customers that are discounted by \$9.25 for the local voice service component of the bundle.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at http://www.delcambre.net/telephone\_life\_line.html.

#### **LINE 3010 - MILESTONE CERTIFICATION**

Delcambre Telephone Company, LLC ("the Company") hereby certifies that the Company has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time. If the Company determines that a request for broadband at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service of at least 4 Mbps downstream/1 Mbps upstream.

DELCAMBRE TELEPHONE CO., L.L.C.
FINANCIAL REPORT
DECEMBER 31, 2015

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#### INDEPENDENT ACCOUNTANTS' REVIEW REPORT

To the Board of Directors Delcambre Telephone Co., L.L.C. Delcambre, Louisiana

We have reviewed the accompanying balances sheets of Delcambre Telephone Co., L.L.C., which comprise the balances sheets as of December 31, 2015 and 2014, and the related statements of income, members' equity, and cash flows for the years then ended, and the related notes to the financial statements. A review includes primarily applying analytical procedures to management's financial data and making inquiries of Company management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements as a whole. Accordingly, we do not express such an opinion.

#### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement whether due to fraud or error.

#### Accountants' Responsibility

Our responsibility is to conduct the reviews in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. Those standards require us to perform procedures to obtain limited assurance as a basis for reporting whether we are aware of any material modifications that should be made to the financial statements for them to be in accordance with accounting principles generally accepted in the United States of America. We believe that the results of our procedures provide a reasonable basis for our report.

#### **Accountants' Conclusion**

Based on our reviews, except for the issue noted in the Known Departure from Accounting Principles Generally Accepted in the United States of America paragraph, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

# Known Departure from Accounting Principles Generally Accepted in the United States of America

As disclosed in Note 1 to the financial statements, accounting principles generally accepted in the United States of America would require the Company to consolidate its financial statements with its wholly owned subsidiary, Delcambre Cellular, L.L.C. The Company's management has informed us that the Company is reporting the investment in its subsidiary using the cost method of accounting.

Brussed Posli, LLP

Lafayette, Louisiana June 30, 2016

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#### DELCAMBRE TELEPHONE COMPANY, L.L.C.

# BALANCE SHEETS December 31, 2015 and 2014

ASSETS <u>2015</u> <u>2014</u>

#### **CURRENT ASSETS**

Cash and cash equivalents Accounts receivable Inventory Prepaid insurance Other current assets

Total current asset

#### **INVESTMENTS**

#### PROPERTY AND EQUIPMENT

Land

Depreciable assets, net of accumulated depreciation

Total property and equipment

Total assets

#### LIABILITIES AND MEMBERS' EQUITY

#### **CURRENT LIABILITIES**

Accounts payable Accrued expenses

Total current liabilities

#### OTHER LIABILITIES

Due to related parties

Total liabilities

#### **MEMBERS' EQUITY**

Total liabilities and members' equity

#### DELCAMBRE TELEPHONE COMPANY, L.L.C.

# STATEMENTS OF INCOME Years Ended December 31, 2015 and 2014

Income:

Local network services
Long distance network services
Other regulated revenue
Non-regulated revenue

Total operating revenues

Operating expenses:

Plant specific expense
Plant nonspecific expense
Depreciation
Customer operation expense

Corporate operation expense

Total operating expenses

Operating loss

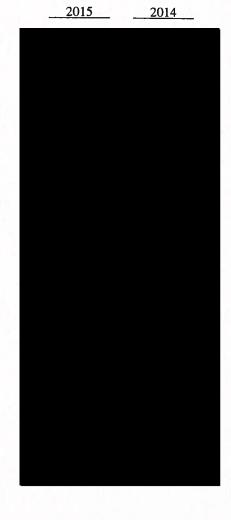
Other income (expenses):

Interest income

Bad debt

Total other income (expenses), net

Net loss



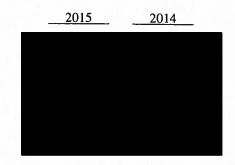
# DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF MEMBERS' EQUITY Years Ended December 31, 2015 and 2014

Members' equity, beginning

Net loss

Members' equity, ending



#### DELCAMBRE TELEPHONE COMPANY, L.L.C.

# STATEMENTS OF CASH FLOWS Years Ended December 31, 2015 and 2014

CASH FLOWS FROM OPERATING ACTIVITIES

Net loss

Adjustments to reconcile net loss to net cash provided by operating activities:

Depreciation

(Increase) decrease in current assets -

Accounts receivable

Inventory

Prepaid expenses

Other current assets

Increase (decrease) in current liabilities -

Accounts payable

Accrued expenses

Net cash provided by operating activities

#### CASH FLOWS FROM INVESTING ACTIVITIES

Payments for the purchase of property and equipment Redemption of certificate of deposit

Net cash used in investing activities

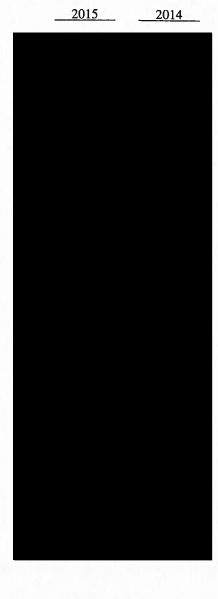
#### CASH FLOWS FROM FINANCING ACTIVITIES

Advances from related parties

Net decrease in cash and cash equivalents

Cash and cash equivalents at beginning of year

Cash and cash equivalents at end of year



#### DELCAMBRE TELEPHONE CO., L.L.C.

# NOTES TO FINANCIAL STATEMENTS See Independent Accountants' Review Report

#### Note 1. Accounting Policies

This summary of significant accounting policies of Delcambre Telephone Co., L.L.C., (the "Company") is presented to assist in understanding the Company's financial statements. The financial statements and notes are representations of the Company's management who are responsible for their integrity and objectivity.

#### Nature of operations:

The Company is an incumbent local exchange carrier. The Company provides local phone service and digital subscriber line ("DSL") over copper as well as telephone, broadband and video over fiber to the community of Delcambre, Louisiana and its surrounding area.

#### Basis of accounting:

The Company's policy is to prepare its financial statements on the accrual basis of accounting; consequently, revenues are recognized when earned rather than when received, and expenses are recognized when the obligation incurred rather than when cash is disbursed.

#### Use of estimates:

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

#### Cash and cash equivalents:

For purposes of reporting cash flows, the Company considers all highly liquid debt instruments purchased with an original maturity of three months or less to be cash equivalents.

#### Receivables:

Accounts receivable are recorded at net realizable value. The Company provides provisions for uncollectible accounts receivable based upon factors surrounding the credit risk and activity of specific customers, historical trends and other information. The allowance is reviewed periodically and adjusted for accounts deemed uncollectible by management. After all attempts to collect a receivable have failed, the receivable is written off against the allowance. The Company has determined that the amount of allowance as of December 31, 2015 and 2014 are immaterial.

#### Property and depreciation:

Property and equipment are carried at cost. Assets are depreciated over their estimated useful life using the straight-line method. When property and equipment are retired, the related costs and accumulated depreciation are removed from the respective accounts and the net gain or loss is reflected in income.

#### NOTES TO FINANCIAL STATEMENTS

#### Income taxes:

As a limited liability company, the Company's taxable income or loss is allocated to members in accordance with their respective percentage ownership. Therefore, no provision or liability for income taxes has been included in the financial statements.

Management evaluated the Company's tax positions and concluded that the Company had taken no uncertain tax positions that require adjustment to the financial statements to comply with the provisions of this guidance. With few exceptions, the Company is no longer subject to income tax examinations by the U.S. federal or state tax authorities for years before 2011.

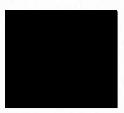
#### Accounting for wholly owned subsidiaries:

Accounting Standards Codification 810, Consolidation, provides that the purpose of consolidated financial statements is to present, primarily for the benefit of the owners and creditors of the parent, the results of operations and the financial position of a parent company and all its subsidiaries as if the consolidated group were a single economic entity. There is a presumption that consolidated financial statements are more meaningful than separate financial statements and that they are usually necessary for a fair presentation when one of the entities in the consolidated group directly or indirectly has a controlling financial interest in the other entities. Accordingly, under ASC 810, all subsidiaries - that is, all entities in which a parent has a controlling financial interest - should be consolidated. The Company accounts for its investment in its wholly owned subsidiary on the cost basis of accounting.

#### Note 2. Investments

At December 31, 2015, the Company had investments in the following entities:

Investment in Delcambre Cellular, L.L.C. Investment in NECA



Both investments are accounted for on the cost method of accounting; whereby only dividends received are recorded as income.

#### NOTES TO FINANCIAL STATEMENTS

### Note 3. Property, Equipment and Depreciation

The major classes of property and equipment, depreciation expenses and accumulated depreciation are as follows as of December 31, 2015 and 2014:

		2015		
Class	Cost	Depreciation	Accumulated Depreciation	
Buildings				
Motor vehicles				
Special purpose vehicles				
Furniture and office equipment				
Computer software				
Poles				
Equipment cable and wire				
		2014		
			Accumulated	
Class	Cost	Depreciation	Depreciation	
Buildings				
Motor vehicles				
Special purpose vehicles				
Furniture and office equipment				
Computer software				
Poles				
Equipment cable and wire				
Equipment cable and wife	1.17			
	11/4			
	11. "			

# Note 4. Concentration of Credit Risk

All of the Company's income is derived from providing cellular, internet, and cable services to local individuals and businesses in the geographic region in and around Delcambre, Louisiana.

Throughout the year, the Company may have cash on deposit with local financial institutions in excess of FDIC insurance coverages. The Company does not anticipate any loss as a result of uninsured amounts.

#### Note 5. Related Parties

As of December 31, 2015 and 2014, the Company has a payable to Delcambre Cellular, L.L.C., a wholly owned subsidiary, in the amount of and and respectively.

#### NOTES TO FINANCIAL STATEMENTS

# Note 6. Subsequent Events

The Company evaluated the need for disclosures and/or adjustments resulting from subsequent events through June 30, 2016 the date of the financial statements were available to be issued. This evaluation did not result in any subsequent events that necessitated disclosures and/or adjustments under general accounting standards.

# OFFICER CERTIFICATION pursuant to 47 C.F.R. §54.313(f)(2)

I, Matt LeBlanc, President of Delcambre Telephone Company, LLC, hereby certify that Delcambre Telephone Company was (a) not audited in the ordinary course of business for fiscal year 2015, and (b) that the reported data are accurate.

Matt LeBlanc

President

Delcambre Telephone Company, LLC

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